

**From:** [steve.bollinger@gm.com](mailto:steve.bollinger@gm.com)  
**To:** [DavidA.Wright/AA/USEPA/US@EPA](mailto:DavidA.Wright/AA/USEPA/US@EPA)  
**Cc:** [randall.c.harvey@gm.com](mailto:randall.c.harvey@gm.com); [william.w.watson@gm.com](mailto:william.w.watson@gm.com); [Joel.Ball/AA/USEPA/US@EPA](mailto:Joel.Ball/AA/USEPA/US@EPA); [Stephen.Healy/AA/USEPA/US@EPA](mailto:Stephen.Healy/AA/USEPA/US@EPA)  
**Subject:** Re: Preliminary 2014 VECI Labels with HD GHG Content for Complete/Incomplete Vehicles Chassis Certified [ATTACHMENT REMOVED]  
**Date:** 01/04/2013 08:07 AM  
**Attachments:** 2014 VECI DieselChassis.pdf

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Dave per agreement with Steve Healy, we did not feel that the new standards, that GM first started certifying to effective with the 2011 Model year were adequately defined by the HDV nomenclature. Therefore, Steve and I agreed that the HD8510 and HD1014 nomenclature would better describe the Standards that the test groups were being certified to. GM had been using HDV as the descriptor for the vehicle class that these vehicles belong in since 2009 and we continue to use this for the vehicle class. I recently researched the regulations again to find the definition for HDV1 and HDV2 for how these acronyms apply to regulatory standards and could not find these terms defined or referenced anywhere. (Regulatory sections researched Title 40 85.501 - 85.2305, 86.1 - 86.1930, 1036.1 - 1036.825, and 1037.1 - 1037.825)

CISD-06-19 recommends using HDV, HDV1, or HDV2 for the vehicle class and GM elected to stay with HDV for the vehicle class. CISD-06-19 recommends using HDV for the vehicle standards which Steve and I did not feel was descriptive enough, since the standards are different.

Standard	NMHC	CO	NOx	PM	HCHO
HD8510	0.195	7.3	0.2	0.02	0.032
HD1014	0.230	8.1	0.4	0.02	0.040

If you feel strongly that we should change for 2014 MY we could replace the HDV vehicle class with HDV1 and HDV2 vehicle classes and change the standards from HD8510 and HD1014 to HDV.

Steve Bollinger  
Total Compliance Engineer  
248-830-8342  
Milford Proving Grounds  
Building 31E-123

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**From:** [Wright.DavidA@epamail.epa.gov](mailto:Wright.DavidA@epamail.epa.gov)  
**To:** [steve.bollinger@gm.com](mailto:steve.bollinger@gm.com)  
**Cc:** [randall.c.harvey@gm.com](mailto:randall.c.harvey@gm.com), [william.w.watson@gm.com](mailto:william.w.watson@gm.com), [Ball.Joel@epamail.epa.gov](mailto:Ball.Joel@epamail.epa.gov), [Healy.Stephen@epamail.epa.gov](mailto:Healy.Stephen@epamail.epa.gov)  
**Date:** 12/13/2012 04:15 PM  
**Subject:** Re: Preliminary 2014 VECI Labels with HD GHG Content for Complete/Incomplete Vehicles Chassis Certified [ATTACHMENT REMOVED]

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Steve,

As I look at the example labels you have provided for both the gasoline and diesel examples, I have at least one initial question. Attachment 10 of EPA guidance letter, CISD-06-19, New Examples of VECI Labels and Heavy-Duty Engine Labels, provides a list of suggested acronyms. For the HDV vehicle class, it recommends using the acronym HDV1 for HDVs with GVWRs from 8501 to 10,000 lbs, and HDV2 for HDVs with GVWRs from 10,001 to 14,000 lbs. The criteria emission standards acronym would then be HDV and the reference to 40 CFR 1037.104 would be the GHG standards. I am wondering why you would not be using the recommended convention from the guidance letter for the vehicle class and criteria emission standards?

Thanks,

David A. Wright  
U.S. EPA - OTAQ  
Compliance Division, Light-Duty Vehicle Center  
2565 Plymouth Road  
Ann Arbor, Michigan 48105  
734 214-4467  
e-mail:wright.davida@epa.gov

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steve.bollinger---12/11/2012 03:42:15 PM---David, I have attached GM's production intent VECI Labels for our vehicles and engines using the 6.

From: steve.bollinger@gm.com  
To: DavidA.Wright/AA/USEPA/US@EPA  
Cc: william.watson@gm.com, randall.c.harvey@gm.com  
Date: 12/11/2012 03:42 PM  
Subject: Preliminary 2014 VECI Labels with HD GHG Content for Complete/Incomplete Vehicles Chassis Certified

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David, I have attached GM's production intent VECI Labels for our vehicles and engines using the 6.6L Duramax Diesel. While the statements on these labels do not exactly match the statements specified in the regulations due to space constraints, GM believes that the labels are configured to present all the information required by the regulations.

I will be submitting these labels as the final version with our 2014 application for certification.

Please reply to this email or call if you have any questions or comments.

Note that the label for the new Cruze Diesel is also included but has no HD GHG content.

Steve Bollinger  
Total Compliance Engineer  
248-830-8342  
Milford Proving Grounds  
Building 31E-123

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and delete it from your computer. (See attached file: 2014 VECI DieselChassis.pdf)

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